

July 30, 1999

FACILITY REVIEW AND APPROVAL OF UTILITY SYSTEMS FOR YEAR 2000 COMPLIANCE

1. PURPOSE: This Veterans Health Administration (VHA) Directive establishes a facility review process for the disposition of utility systems that are not fully year 2000 compliant.

2. BACKGROUND

a. Year 2000 issues with healthcare facility utility systems may be present in programmable software and hardware, embedded chips, system component interfaces or inter system interfaces both informational and Code required. These issues stem from design strategies predicated on severely limited storage that resulted in years being represented by two digits i.e. 98 for 1998. There is concern that the year 2000 represented as 00 may be interpreted as 1900 which can affect calculations sensitive to date or day of the week. Further the device response may be to proceed incorrectly or shut down. With nearly all energy using devices dependent on the smooth operation of utility systems it is essential that year 2000 issues with these systems be diligently addressed.

b. To determine the compliance status of Department of Veterans Affairs (VA) healthcare facilities utility systems, VHA has taken several steps including communicating with manufacturers of utility systems equipment components concerning the year 2000 compliance status of their products. Manufacturer responses have been posted on a VHA Intranet site designed to provide information about year 2000 issues that can be accessed at <http://www.va.gov/year2000>. Furthermore VHA has compiled and shared this information in a joint effort with the Army, Air Force, Navy, Department of Health and Human Services and the Bureau of Prisons.

c. VHA has defined categories of compliance status as follows:

(1) **Fully Compliant (FC).** Fully compliant means that a utility system component functions properly in all aspects upon the change to year 2000 without requiring user intervention.

(2) **Conditionally Compliant (CC).** Conditionally compliant means that a utility system component requires user intervention to function in all aspects upon the change to the year 2000. This may include a manufacturer software and/or hardware update or other one-time user action.

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(3) **Non-Compliant (NC)**. Non-compliant means that a utility system component will not function properly in all aspects upon the change to the year 2000 and no manufacturer remedy is available.

d. For utility systems component review is an initial step to system review followed by interface review. For utility systems to be fully year 2000 compliant all components and interfaces must be year 2000 compliant. It may not be possible to determine that all utility systems are fully year 2000 compliant.

e. Approaches to Utility system and interface components determined to be conditionally compliant, non-compliant or unknown compliance status:

- (1) Replace the component and/or interface with a year 2000 compliant component.
- (2) Retire the component after making a determination that it is no longer needed.
- (3) Schedule and carry out the steps necessary to continue to use a conditionally compliant component and/or interface.
- (4) Use the component as is after making a determination that year 2000 failure or degradation does not impact the safe operation of the utility system.
- (5) Develop and test a work-around for the component and/or interface so that the utility system functions safely despite failure or degradation of the component and/or interface.
- (6) Make a determination that the particular utility system affected is non-essential to mission and safe operation of the healthcare facility.

3. POLICY: Department of Veterans Affairs (VA) policy requires that utility systems be managed to promote a safe controlled and comfortable environment of care. Quality Assurance programs at the medical facility level must address the year 2000 implications for utility systems.

4. ACTION

a. VA healthcare facilities must designate the appropriate committee to review and make recommendations on the disposition of utility systems that are not yet assessed or identified as non-compliant or conditionally compliant for year 2000 purposes. Existing committees such as the Environment of Care Committee or the Safety Committee or the year 2000 Committee are appropriate. The review shall be completed no later than September 1, 1999, and the recommended disposition shall be forwarded to the facility Director for approval.

b. Adequate contingency plans are required for all utility systems even if the utility system is fully compliant. Assistance for compliance with this directive can be obtained by contacting, Arnold Bierenbaum, Chief Network Office at (202) 273-5881 or Leonard Bourget, Chief Information Office at (202)273-8669.

5. REFERENCES: None.

6. FOLLOW-UP RESPONSIBILITY: The Chief Network Officer (10N) and Chief Information Officer (19) are responsible for the contents of this directive.

7. RESCISSION: This VHA Directive expires December 31, 1999.

A handwritten signature in black ink, reading "Thomas L. Garthwaite". The signature is written in a cursive, flowing style with a large initial 'T' and 'G'.

Thomas L. Garthwaite, M.D.
Acting Under Secretary for Health

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